

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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NICOLE RAMOS,

Plaintiff,

-against-

PILLER, INC.,

Defendant.

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**INITIAL  
DISCLOSURES  
PURSUANT TO  
RULE 26(a)(1)**

Civil Action No.  
07-CV-4047 (SCR)

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, defendant PILLER, INC. ("Piller"), by and through its attorneys, Iseman, Cunningham, Riester & Hyde, LLP, provides the following as its Initial Disclosures:

1. The names of individuals likely to have discoverable information that Piller may use to support its defenses are: Michael Haber, Sandy Piazza, Bernard Watson, Angelica Hoffman, Mark T. Nuelle, Sarah Stopyra, Michael Barron, Mike Scott, Ethel Crow, Kathleen Wiley, Doug Hindman and Jon Sanderson. Except for Jon Sanderson, Doug Hindman, Bernard Watson, Mike Scott, Mark Nuelle and Sarah Stopyra each of these individuals is employed by Piller at 45 Turner Road, Middletown, New York 10941-2047, and may be reached through counsel. Jon Sanderson was or is employed by Cynetix Group, Ltd., at Unit C1, Aven Industrial Park, Tickhill Road, Maltby, Rotherham, South Yorkshire, United Kingdom S66 7QR (Tel. No. 01709 81 99 22). Doug Hindman was or is employed by Claudius Peters (Americas) Inc., at 4141 Blue Lake Circle, Suite 260, Dallas, Texas 75244, and may be reached through counsel. Bernard Watson is employed by Langley Holdings, Plc, County Estate Sutton in Ashfield, Nottinghamshire, United Kingdom, DN22 7AN, and may be reached through counsel. Mike Scott was or is employed by The Clarke Chapman Group, Ltd., P.O. Box 9, Saltmeadows Road, Gateshead, United Kingdom, NE5 1YL, and may be reached

through counsel. Mark Nuelle and Sarah Stopyra were formerly employed by Piller, but their present address is unknown. Depending upon the specific legal and factual theories advanced by plaintiff, Piller reserves the right to identify other individuals as potential fact witnesses. This list of witnesses does not include witnesses to be called solely for the purposes of impeachment.

2. The following are documents and tangible things that are in the possession, custody, or control of Piller and which Piller may use to support its defenses: documents regarding investigation by The Equal Employment Opportunity Commission; personnel files of relevant individuals; e-mail and correspondence between relevant individuals; documents related to the operation of Piller's accounting department; and Piller's Employee Handbook. These documents are located at Piller, Inc., at 45 Turner Road, Middletown, New York 10941-2047. This list does not include documents to be used solely for the purposes of impeachment. These documents will be provided to plaintiff upon execution of an appropriate confidentiality and protective order.

C. Piller is not seeking an award for damages against plaintiff. Accordingly, Piller has no computation of any category of damages to disclose.

D. As of the date of this disclosure, no insurance company may be liable to satisfy part or all of any judgment that may be entered in favor of plaintiff against Piller.

PLEASE TAKE NOTICE that Piller reserves the right to supplement these Initial Disclosures, if appropriate, after further discovery and investigation has been completed.

DATED: September 6, 2007

ISEMAN, CUNNINGHAM, RIESTER  
& HYDE, LLP

Attorneys for Defendant Piller, Inc.

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